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The American Lung  
Association's mission is to  
prevent lung disease and  
promote lung health.

Improving Life,  
One Breath at a Time



October 1, 2007

Glenn Acosta, Senior Engineer  
Planning Section, Facilities Planning Department  
Los Angeles County Sanitation Districts  
1955 Workman Mill Road  
Whittier, CA 90012

Re: Request for an Environmental Impact Report (EIR) at the Palos Verdes Gas-to-Energy Center

Dear Mr. Glenn Acosta,

I am writing on behalf of the American Lung Association, one of the nation's oldest public health organizations, and our 2 million physicians, scientists, parents, and community members in just California alone. The American Lung Association of California thanks you for the opportunity to comment on the initial study and draft negative declaration prepared by the County Sanitation Districts of Los Angeles (LACSD) for the proposed reconfiguration of the Palos Verdes Gas to Energy Facility project (the Project). While the American Lung Association of California strongly supports the use of renewable energy and the best available control technology, we are concerned about several aspects of this proposed project. Specifically, we are concerned about many of the assumptions upon which the Initial Study and draft negative declaration (IS/ND) is based; the limited project alternatives analyzed; and the impact that this project would have on sensitive receptors, including sixteen schools located within a two miles radius of the PalosVerdes Landfill.

The analysis and disclosure within the IS/ND are insufficient to support LACSD's conclusion that the Project could not have a significant effect on the environment. Although air quality guidance standards from the South Coast Air Quality Management District are cited in the Initial Study, this study does not adequately address localized impacts. Localized impacts may still be significant even if certain region-wide standards are met. As seen within the Initial Study, the overall amount of carbon monoxide emissions will increase significantly based on the proposed Project and this could have adverse health impacts on the local community. Also concerning is that this emission projection may be an under-estimation of impact because the IS/ND does not consider emissions associated with construction. Additionally, the IS/ND may be overestimating the efficiency of the facility, which could lead to more off-gassing than originally estimated. Therefore, in accordance with the California Environmental Quality Act (CEQA), the American Lung Association of California requests that the LACSD proceed with an Environmental Impact Report (EIR) of the proposed


conversion Project in order to thoroughly evaluate and determine the potential air quality impacts of the Project.

As part of an EIR, the American Lung Association of California requests that LACDS fully consider other project options. Although the Initial Study states that “there are currently no commercially viable technologies to generate power from... landfill gas with very low methane content,” the Air Quality Study does not sufficiently detail the impacts of potential advantages of different technologies. We request that this omission be corrected in an EIR by examining other Project options.

Given the close proximity of residences and schools and the strong concerns of the community regarding the impacts the operation will inevitably impose upon them, we believe it behooves the operators of the facility to perform as thorough an evaluation as possible and to include public input and feedback into the process as guaranteed by CEQA. While the Initial Study states that “no school is within 2,300 feet” of the facility, the community believes that Rancho Vista Elementary and First Baptist Church’s preschool are both located within 1,000 feet of the landfill. Including public input and feedback at all stages of the CEQA process will help to alleviate these misunderstandings and well as allay concerns about emission levels associated with Phase II of the Project.

Thank you for considering the American Lung Association of California’s request for an EIR and correcting the insufficient evidence in the Initial Study. If you have any questions, please don’t hesitate to contact me at [ccallahan@alac.org](mailto:ccallahan@alac.org) or 213-384-5864.

Sincerely,



Colleen Callahan  
Manager of Air Quality Policy and Advocacy  
American Lung Association of California

Cc: Torrance City Council  
Rolling Hills Estates City Council  
Rancho Palos Verdes City Council